

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SHAUNA NOEL, et al

Plaintiffs,

-against-

CITY OF NEW YORK,

Defendant.
-----X

KATHARINE H. PARKER, UNITED STATES MAGISTRATE JUDGE:

Plaintiffs commenced this action to challenge a New York City policy regarding affordable housing lotteries. The City's policy allocates 50% of units in affordable housing lotteries to individuals who already reside in the community district where the new affordable housing units are located. This policy is referred to herein as the "Community Preference Policy." Plaintiffs allege that the Community Preference Policy violates the federal Fair Housing Act ("FHA"), 42 U.S.C. § 3604 *et seq.*, and the New York City Human Rights Law ("NYCHRL"), NYC Admin. Code § 8-107, *et seq.*, because it perpetuates racial segregation and disparately impacts racial minorities. They also claim that the City's decision to establish, expand, and maintain the policy constitutes intentional discrimination.

Currently pending before this Court is Plaintiffs' motion challenging privilege designations on 500 documents in the City's privilege log. The City asserts that the documents are protected from disclosure based on one or more of the following reasons: (1) attorney-client privilege, (2) work product protection, (3) deliberative process privilege, and (4)

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legislative privilege. This Court assumes the reader's familiarity with the factual background of this case based on its many decisions in this action and does not repeat it here. *See Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 5664852, at *1-6 (S.D.N.Y. Nov. 27, 2017); *Winfield v. City of New York*, No. 15-cv-5236 (LTS) (DCF), 2016 WL 6208564, at *1-3 (S.D.N.Y. Oct. 24, 2016); *see also Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 2880556, at *1-2 (S.D.N.Y. July 5, 2017), objections overruled by, 2017 WL 5054727, at *1-2 (S.D.N.Y. Nov. 2, 2017).

The City submitted for *in camera* review a detailed privilege log with hyperlinks to all 500 documents and, in some cases, cover emails for the documents. The City also submitted a series of letters at this Court's request providing greater detail as to the basis for the assertion of privilege as to certain documents and categories of documents. In addition, after questions by the Court as to certain documents, the City withdrew its privilege designations and elected to produce these documents.¹

In addition, the Court is in receipt of the ruling of the Honorable Laura Taylor Swain dated December 12, 2018 setting aside this Court's February 2018 Order insofar as it addressed claims of deliberative process privilege. *See* ECF Nos. 259, 655. This Court has, consistent with Judge Swain's ruling, evaluated the City's claims of deliberative process privilege and whether disclosure is warranted under the factors set forth in *Rodriguez v. Pataki*, 280 F. Supp.2d 89, 99-

¹ The documents the City has decided to produce are identified on the privilege log in column A as numbers: 1, 5, 13, 14, 24, 65, 66, 72, 74, 75, 95, 106, 107, 108, 119, 124, 125, 130, 147, 233, 255, 303, 307, 328, 333, 341, 345, 353, 354, 360, 362, 372, 373, 374, 376, 378, 380, 382, and 499. Certain of these documents will be produced in redacted format.

101 (S.D.N.Y. 2003), in the manner prescribed by Judge Swain. This Court has adopted the same methodology for evaluating whether documents subject to the legislative privilege should nevertheless be produced pursuant to the *Rodriguez* balancing factors. Because this Court has previously set forth the standards governing applicability of the attorney-client privilege and work product privilege, it does not repeat them in detail here and refers the parties to the Court's prior decision. See ECF No. 259.

The Court has carefully reviewed all of the submissions by the parties and all 500 documents. In the interest of brevity and expediency, the Court does not discuss its reasoning as to each of the 500 documents here. Instead, the Court discusses treatment of certain categories of documents and provides an annotated spreadsheet providing additional information about each document and its rulings as to each.

Discussion

I. Attorney-Client Privilege

The attorney-client privilege "exists for the purpose of encouraging full and truthful communications between an attorney and his client and 'recognizes that sound legal advice or advocacy serves public ends and that such advice or advocacy depends upon the lawyer's being fully informed by the client.'" *In re Von Bulow*, 828 F.2d 94, 100 (2d Cir. 1987) (quoting *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981)). The party seeking to invoke the privilege bears the burden of establishing its applicability. *In re Cty. of Erie*, 473 F.3d 413, 418 (2d Cir. 2007). To do this, the governmental party claiming attorney-client privilege must establish: (1) a communication between government counsel and their clients, (2) that was intended to be and

was in fact kept confidential, and (3) was made for the purpose of obtaining or providing legal advice. *See id.* at 419 (internal citation omitted). As to factor 3, the key inquiry is whether the “predominant purpose” of the communication is to solicit or provide legal advice. *Id.* at 419-20 (collecting cases). When legal advice is the predominant purpose, “other ‘considerations and caveats’ are not severable and the entire communication is privileged.” *Fox News Network, LLC v. US Dep’t of Treasury*, 739 F. Supp. 2d 515, 560 (citing *In re Cty. of Erie*, 473 F.3d at 420). On the other hand, if the legal advice is merely “incidental to the nonlegal advice that is the predominant purpose of the communication,” then the legal portions of the document may be redacted. *In re Cty. of Erie*, 473 F.3d at 420 n.8.

With these standards in mind, the following documents on the City’s privilege log are protected by the attorney-client privilege: 3, 4, 18, 19, 22, 23, 25, 26², 27, 38, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 42, 44, 51, 53, 59, 60, 69, 70, 71, 80, 92, 93, 94, 96, 97, 98, 100, 109, 110, 113, 114, 120, 122, 123, 126, 136, 139, 140, 142, 159, 163, 175, 178, 190, 193, 194, 216, 218, 232, 235, 238, 239, 240, 241, 242, 245, 248, 250, 251, 256, 266, 274, 275, 287, 288, 295, 298, 300, 306, 346, 349, 357, 359, 361, 363, 364, 470, 472, 476, 478, 480, 485. All of these documents involve communications and draft documents exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice. Because the attorney-client privilege applies, the Court does not need to reach any other privilege asserted. The following documents are not protected by the attorney-client privilege

² A substantial portion of the communications in this document are not privileged. The City shall produce a redacted version of this document redacting the limited portions that relate to topics on which legal advice is sought or given.

but, if subject to another privilege, are identified in the appropriate section below: 0, 4, 13, 43, 46, 95, 128, 130, 141, 165, 166, 176, 186, 233, 253, 254, 255, 260, 261, 263, 264, 265, 273, 279, 282, 284, 289, 291, 292, 293, 321, 342, 353, 360, 477, 499. These documents do not reflect communications or drafts exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice.

II. Work Product

The work product doctrine protects a broader category of documents and communications than the attorney-client privilege. Specifically, it protects documents and other tangible things “that are prepared in anticipation of litigation or for trial by or for a party or its representative.” Fed. R. Civ. P. 26(b)(3)(A); *see also Bowne of N.Y.C., Inc. v. AmBase Corp.*, 150 F.R.D. 465, 471 (S.D.N.Y. 1993). Documents “should be deemed prepared ‘in anticipation of litigation’ . . . if, ‘in light of the nature of the document and the factual situation in the particular case, the document can fairly be said to have been prepared or obtained *because of* the prospect of litigation.’” *United States v. Adlman*, 134 F.3d 1194, 1202 (2d Cir. 1998) (emphasis in original) (internal citation omitted). “Where a document was created because of anticipated litigation, and would not have been prepared in substantially similar form but for the prospect of that litigation,” it is protected as work product. *Id.* at 1195. “Conversely, protection will be withheld from ‘documents that are prepared in the ordinary course of business or that would have been created in essentially similar form irrespective of litigation.’” *Schaeffler v. United States*, 806 F.3d 34, 43 (2d Cir. 2015) (quoting *Adlman*, 134 F.3d at 1202).

Work product protection, however, is not absolute. A party seeking discovery may overcome work product protection and obtain disclosure of material otherwise discoverable under Fed. R. Civ. P. 26(b)(1) by showing (1) substantial need for the material; and (2) an inability to obtain its substantial equivalent from another source without undue hardship. Fed. R. Civ. P. 26(b)(3)(A); *Obeid v. Mack*, No. 14-cv-6498 (LTS) (HBP), 2016 WL 7176653, at *5 (S.D.N.Y. Dec. 9, 2016). Although factual materials “may generally be discovered upon a showing of substantial need,” *Obeid*, 2016 WL 7176653, at *5 (internal quotation marks and citations omitted), courts “*must* protect against disclosure of the mental impressions, conclusions, opinions, or legal theories of a party’s attorney or other representative concerning the litigation.” Fed. R. Civ. P. 26(b)(3)(B) (emphasis added). “Documents or portions of documents that qualify as ‘opinion work product’ are ‘entitled to virtually absolute protection.’” *United States v. Mount Sinai Hosp.*, 185 F. Supp. 3d 383, 390 (S.D.N.Y. 2016) (quoting *United States v. Ghavami*, 882 F. Supp. 2d 532, 540 (S.D.N.Y. 2012)).

With these standards in mind, the following documents on the City’s privilege log are protected by the work product doctrine: 6, 7, 8, 10, 11, 15, 16, 17, 47, 61, 76, 77, 78, 79, 81, 82, 85, 86, 89, 104, 118, 127, 129, 131, 133, 134, 135, 137, 138, 141, 149, 150, 151, 153-158, 160, 161, 162, 164, 165, 166, 167, 169, 170, 171, 172, 177, 182, 183, 184, 185, 188, 191, 192, 195-201-211, 220-230, 281, 366-371, 375, 377, 379, 381, 383-464, 466-469, 483, 484, 486-493, 498, 500. All of these documents were prepared in anticipation of this litigation or litigation with the U.S. Department of Housing and Urban Development (“HUD”) and not in the normal course of business. Of these documents, a number contain mental impressions, analyses or studies,

conclusions, opinions, or legal theories of an attorney or other representative of the City concerning this litigation or potential litigation with HUD over the Community Preference Policy. A number of the documents were created solely for analyzing settlement positions. Having reviewed these documents, the Court finds there is no substantial need for the documents and, indeed, the vast majority reflect core work product that must be protected regardless under Federal Rule of Civil Procedure 26(b)(3). *See Adlman*, 134 F.3d at 1196 (The work product doctrine “is intended to preserve a zone of privacy in which a lawyer can prepare and develop legal theories and strategy with an eye toward litigation, free from unnecessary intrusion by his adversaries”) (internal quotation marks omitted).

Additionally, with respect to documents reflecting settlement negotiations, proffers and strategy, the Court notes that such documents are inadmissible at trial under Federal Rule of Evidence 408 as evidence of the admission of the validity or invalidity of a claim. Fed. R. Evid. 408. The rationale behind the rule is that settlement proposals are irrelevant, as they “may be motivated by a desire for peace rather than from any concession of weakness of position” and “to promote settlement of disputes.” 1972 Advisory Committee Notes to Rule 408; *see also* Fed. R. Civ. P. 68 (evidence of an unaccepted offer of judgment is not admissible as evidence of liability). Rule 408 does permit admission of information that would prove bias of a witness, negate a contention of undue delay, or prove an effort to obstruct a criminal investigation or prosecution. Fed. R. Evid. 408; 1972 Advisory Committee Notes to Rule 408. The 2006 Advisory Committee Notes to Rule 408 explicitly state that the rule “prohibits use of statements made in settlement negotiations to impeach by prior inconsistent statement or through contradiction.”

2006 Advisory Committee Notes to Rule 408 (citing *EEOC v. Gear Petroleum, Inc.*, 948 F.2d 1542 (10th Cir. 1991) (letter sent as part of settlement negotiation cannot be used to impeach defense witnesses by way of contradiction or prior inconsistent statement; such broad impeachment would undermine the policy of encouraging uninhibited settlement negotiations)). Based on this Court's review of the documents concerning settlement, it is the Court's view that they could not be appropriately used for any permitted purpose under Federal Rule of Evidence 408. Therefore, they are protected from disclosure.

The following documents are not work product: 5, 24, 73, 106, 124, 125, 180, 181, 253, 254, 255, 260, 261, 328, 372, 373, 374, 376, 378, 380, 382, 499. The City acknowledged that some of these documents were not protected work product. Other documents include final versions (or portions thereof) of the City's consolidated plans concerning fair housing submitted to HUD and a factual communication to the Mayor about the filing of this litigation. Accordingly, the City must produce these documents to the extent they are not protected by another privilege. To the extent any of these documents are also marked as being protected by the deliberative process or legislative privilege, they are addressed below.

III. Deliberative Process Privilege

The deliberative process privilege, also referred to as the executive privilege, protects "documents reflecting advisory opinions, recommendations and deliberations comprising part of a process by which governmental decisions and policies are formulated." *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 150 (1975) (internal quotation marks and citation omitted). It applies to both the ultimate decision-making executive and the executive's staff members. *See*

Hopkins v. H.U.D., 929 F.2d 81, 85 (2d Cir. 1991) (work product, opinions, and recommendations of staff are covered by the deliberative process privilege).

To be protected, the documents and communications used in the decision-making process must be both (1) pre-decisional and (2) deliberative. *Marisol A. v. Giuliani*, No. 95-cv-10533 (RJW), 1998 WL 132810, at *6 (S.D.N.Y. Mar. 23, 1998). This means the document must be prepared to aid the decisionmaker in arriving at a decision as opposed to communications that are part of routine agency self-evaluation. *See, e.g., Hopkins*, 929 F.2d at 84; *Marisol A.*, 1998 WL 132810, at *6; *Tigue v. U.S. Dep't of Justice*, 312 F.3d 70, 80 (2d Cir. 2002); *see also Charles v. City of New York*, No. 11-cv-0980 (KAM) (JO), 2011 WL 5838478, at *1 (E.D.N.Y. Nov. 18, 2011).

Even if a document is protected by the deliberative process privilege, a Court may order disclosure after balancing the following five factors and finding that they weigh in favor of disclosure: (i) the relevance of the evidence sought to be protected; (ii) the availability of other evidence; (iii) the 'seriousness' of the litigation and the issues involved; (iv) the role of the government in the litigation; and (v) the possibility of future timidity by government employees who will be forced to recognize that their secrets are violable. *See* ECF 655 (citing *Rodriguez*, 280 F. Supp. 2d at 99-101); *see also In re Delphi Corp.*, 276 F.R.D. 81, 85 (S.D.N.Y. 2011); *Five Borough Bicycle Club v. City of New York*, No. 07-cv-2448 (LAK), 2008 WL 4302696, at *1 (S.D.N.Y. Sept. 16, 2008).

With these standards in mind, the following documents on the City's privilege log are protected by the deliberative process privilege: 9, 12, 21, 34, 41, 45, 48, 52, 63, 68, 83, 84, 87,

88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 145, 146, 148, 152, 168, 174, 176, 187, 189, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 305, 308, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 351, 355, 358, 465, 473, 477, 494, 496, 497. All of these documents precede a policy or other decision by a City agency and reflect the deliberative process in reaching the decision. *See Marisol A.*, 1998 WL 132810, at *6. None appear to be routine self-evaluation. On the other hand, the following documents do not reflect any pre-decisional deliberative process and fall into the category of post-decision communications, post-decision strategy for implementation of decided policy, factual information or routine self-evaluation by an agency: 20, 54, 56, 57, 58, 64, 101, 111, 112, 144, 212, 213, 214, 247, 297, 304, 310, 313, 341, 343, 350, 356, 465, 471, 475, 479, 495. Thus, these documents are not protected by the deliberative process privilege and must be disclosed by the City.

With respect to those documents that are protected by the deliberative process privilege, the Court has applied the five-factor balancing analysis in the manner prescribe by Judge Swain in her December 12, 2018 decision and determined that the following documents need not be produced: 9, 21, 34, 41, 45, 48, 52, 63, 83, 84, 87, 88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 148, 152, 168, 174, 176, 187, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 308, 310, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 473, 477, 494, 496, 497. Many of these documents are drafts that are not

relevant or have marginal relevance and thus I give them little weight in the balancing test.

Likewise, the availability of a final policy and other information about a policy weighs against disclosure. When evaluating the first four factors together against the fifth *Rodriguez* factor, I find that the balance of factors weighs against disclosure of these documents.

On the other hand, the five-factor balancing analysis weighs in favor of disclosure as to the following documents: 12, 68, 145, 146, 189, 277, 305, 351, 355, 358. As to these documents, the relevance factor weighs heavily in favor of disclosure and outweighs the other factors, thereby requiring disclosure.

IV. Legislative Privilege

State and local legislators are entitled to absolute “immunity from liability for their legislative acts” as a matter of federal common law. *Supreme Ct. of Virginia v. Consumers Union of U.S. Inc.*, 446 U.S. 719, 732-33 (1980) (citing *Tenney v. Brandhove*, 341 U.S. 367, 379 (1951)); *Bogan v. Scott-Harris*, 523 U.S. 44, 48-49 (1988); *see also Rodriguez*, 280 F. Supp. 2d at 94-95. Courts within the Second Circuit have repeatedly held that state and local lawmakers are entitled to protection against discovery into their legislative acts in civil cases, explaining that such protection is needed to “shield legislators from civil proceedings which disrupt and question their performance of legislative duties to enable them to devote their best efforts and full attention to the public good.” *See, e.g., Searingtown Corp. v. Inc. Vill. of N. Hills*, 575 F. Supp. 1295, 1299 (E.D.N.Y. 1981) (precluding discovery into motivation of local legislators for rezoning decision that plaintiffs claimed violated their constitutional rights) (internal quotation marks and citations omitted); *ACORN v. Cty. of Nassau*, No. 05-cv-2301 (JFB) (WDW), 2007 WL

2815810, at *2 (E.D.N.Y. Sept. 25, 2007); *see also In Vill. of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 267-68 (1977) (recognizing in dicta that the common law legislative privilege also extends to protection from compelled testimony in civil cases); *Star Distribs., Ltd. v. Marino*, 613 F.2d 4, 6-9 (2d Cir. 1980).

Legislative acts that are protected under the privilege include any activity that is an integral part of the deliberative and communicative processes by which an individual considers whether to vote for or against a proposal. *See Eastland v. U.S. Servicemen's Fund*, 421 U.S. 491, 504 (1975); *Bogan*, 523 U.S. at 54-55. For example, legislative acts may include, but are not limited to: "delivering an opinion, uttering a speech, or haranguing in debate; proposing legislation; voting on legislation; making, publishing, presenting, and using legislative reports; authorizing investigations and issuing subpoenas; and holding hearings and introducing material at committee hearings." *S.E.C. v. Comm. On Ways and Means of the U.S. House of Representatives*, 161 F. Supp. 3d 199, 236 (S.D.N.Y. 2015) (citing *Fields v. Office of Eddie Bernice Johnson*, 459 F.3d 1, 10-11 (D.C. Cir. 2006)) (internal quotation marks omitted).

The legislative privilege also protects formal and informal fact and information-gathering activities about the subject of potential legislation, as well as documents regarding or reflecting the fruits of this research. *See id.* at 236-37, 245; *see also United States v. Biaggi*, 853 F.2d 89, 102-03 (2d Cir. 1988); *McSurely v. McClellan*, 553 F.2d 1277, 1286 (D.C. Cir. 1976) (en banc), *cert. dismissed* 438 U.S. 189 (1978). The privilege does not attach to activities concerning the administration of a law, speeches delivered outside of the legislative body and preparation for the same, the making of appointments with government agencies, and

newsletters and press releases to constituents. *See U.S. v. Brewster*, 408 U.S. 501, 512 (1972); *Hutchinson v. Proxmire*, 443 U.S. 111, 130-33 (1979).

Like the deliberative process privilege, the legislative privilege is qualified, and disclosure may be ordered subject to the same balancing factors applicable to the deliberative process privilege. *Rodriguez*, 280 F. Supp. 2d at 96; *see also Citizens Union of City of N.Y. v. Att’y Gen. of N.Y.*, No. 16-cv-9592 (RMB) (KHP), 2017 WL 3836057, at *18 (S.D.N.Y. Sept. 1, 2017).

Applying these standards, this Court finds that none of the documents the City listed as protected by the legislative privilege in fact fall within the protection of this privilege. These documents are: 49, 55, 98, 99, 102, 179, 345. Thus, the City shall produce all of these documents.

Conclusion

The Court appends a spreadsheet reflecting the Court’s rulings on the 500 documents. The Court also includes its own description of the documents in column R. The City is directed to re-review its privilege log consistent with this ruling and determine whether there are additional documents on its log that must be de-designated as privileged. The City shall complete this task by January 31, 2019 and provide Plaintiffs with an updated log and supplemental production by that date.

To the extent there are objections to this ruling, or Plaintiffs believe that the Court should re-evaluate the balance of *Rodriguez* factors or wish to make a substantial need argument as to a specific document protected by the work product doctrine, this Court

requests that the parties first file a motion for reconsideration with this Court. The parties shall notify the Court by letter if they intend to request reconsideration of a ruling as to a particular document by December 31, 2018. The Court will then set a briefing schedule as to any such motion. To the extent the City does not dispute this Court's ruling with respect to documents deemed non-privileged, it shall produce such documents by January 31, 2019.

SO ORDERED.

Dated: December 18, 2018
New York, New York



KATHARINE H. PARKER
United States Magistrate Judge

| Sort | Production Beginning Bates | Control ID | Privilege(s) | Categorical Description | Court Decisio n | Court's Summary Description of Nature of Document |
|------|----------------------------------|------------------|------------------------------|--|-----------------------|--|
| 0 | | NYCPRIVO 3014 | Attorney Client;Deliberative | Draft Internal Memorandum re: AFFH and Community Preference | NP | communication among counsel and others re: delegation of responsibilities for responding to plaintiff's counsel letter re: fair housing policies |
| 1 | NYC_0067299 | | Deliberative | Draft talking points re: 421-a - Homeless Preference | NP | Per City's Agreement |
| 2 | NYC_0067300 | | Deliberative | Draft talking points re: 421-a - Homeless Preference | NP | |
| 3 | | NYCPRIVO 0004 | Attorney Client | Email chain re: Application of Community Preference | AC | communication with counsel and others re: requests to include prior residents in community preference; identifying issue for legal advice |
| 4 | | NYCPRIVO 0014 | Attorney Client;Deliberative | Email chain re: Community Opposition Strategies | AC & DPP | communications with counsel and others about strategy and potential positions in advance of REBNY Meeting; |
| 5 | | NYCPRIVO 0015 | Work Product | Email chain re: Litigation - Winfield Litigation | NP | Per City's Agreement |
| 6 | | NYCPRIVO 0016 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference | WP & DPP | Settlement Options Analysis |
| 7 | | NYCPRIVO 0017 | Deliberative;Work Product | Draft Internal Memorandum re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | Settlement Options Analysis |
| 8 | | NYCPRIVO 0018 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference | WP & DPP | Settlement Options Analysis |
| 9 | | NYCPRIVO 0023 | Deliberative | Draft Internal Memorandum re: 421-a - Homeless Preference | DPP | Draft decision memo to mayor regarding homeless unit commitment |

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|----|-------------|---------------|---|---|----------|--|
| 10 | | NYCPRIVO 0025 | Work Product | Email chain re: Litigation - Winfield Litigation | WP | Communication about preparation for legal strategy meeting with Mayor about this litigation |
| 11 | | NYCPRIVO 0026 | Deliberative;Work Product | Draft presentation re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | Litigation Strategy Document |
| 12 | | NYCPRIVO 0047 | Deliberative | Email chain re: 421-a - Homeless Preference | DPP | communication regarding potential policy re: 421a units; PRODUCE UNDER RODRIGUEZ |
| 13 | | NYCPRIVO 0061 | Attorney Client | Draft talking points re: MIH - Anti-displacement strategies;Anti-displacement strategies | NP | Per City's Agreement |
| 14 | NYC_0083074 | NYCPRIVO 0063 | Deliberative;Legislative | Draft talking points re: MIH - mobility;MIH - Community opposition;MIH - City council input | NP | Per City's Agreement |
| 15 | | NYCPRIVO 0067 | Work Product | Email chain re: Litigation - Winfield Litigation | WP | Communication about work needed to inform legal strategy |
| 16 | | NYCPRIVO 0068 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation | WP | Litigation Strategy memo |
| 17 | | NYCPRIVO 0069 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference | WP & DPP | Settlement Options Analysis |
| 18 | | NYCPRIVO 0074 | Attorney Client;Deliberative;Work Product | Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation;Community Opposition Strategies | AC | draft decision memo to mayor re: rezonings in specific neighborhoods containing legal advice |
| 19 | 19 | NYCPRIVO 0075 | Attorney Client;Deliberative;Work Product | Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation;Community Opposition Strategies | AC | draft decision memo to mayor re: rezonings in specific neighborhoods containing legal advice |

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|----|-------------|---------------|------------------------------|---|------------|---|
| 20 | | NYCPRIVO 0083 | Deliberative;Legislative | Final talking points (non-public) re: MIH - Anti-displacement strategies;MIH - City council input | NP | internal documents setting forth admin. position to certain issues; shared with CM |
| 21 | | NYCPRIVO 0095 | Deliberative;Legislative | Draft report re: MIH - City council input | DPP | draft considerations for potential modification to MIH; DO NOT PRODUCE UNDER RODRIGUEZ |
| 22 | NYC_0032942 | | Attorney Client | Draft Document re: 421-a - 2015/2016 revision | AC | Attorney comments on draft advertisement for housing on West 42nd St. sent to another City lawyer for further review |
| 23 | | NYCPRIVO 0425 | Attorney Client | Email chain re: Application of Community Preference | AC | communication with attorney and others concerning use of marketing bands for specific housing project; highlighting legal issues with proposed approach |
| 24 | | NYCPRIVO 0435 | Work Product | Email chain re: Litigation - Winfield Litigation | NP | Per City's Agreement |
| 25 | | NYCPRIVO 0474 | Attorney Client | Email chain re: Application of Community Preference | AC | draft language regarding housing ad sent to counsel for legal review and comment |
| 26 | | NYCPRIVO 2106 | Attorney Client;Deliberative | Email chain re: 421-a - Homeless Preference | AC in part | internal communications describing issue on which legal advice sought pertaining to lotteries can be redacted; document otherwise must be produced |
| 27 | | NYCPRIVO 0482 | Attorney Client;Deliberative | Email chain re: Application of Community Preference | AC | communications with attorney and others concerning modifications to CPP in context of preservation projects |
| 28 | | NYCPRIVO 0483 | Attorney Client;Deliberative | Email chain re: Application of Community Preference | AC | communications with attorney and others concerning modifications to CPP in context of preservation projects |
| 29 | NYC_0033138 | | Attorney Client;Deliberative | Draft report re: 421-a - 2015/2016 revision | AC | attorney summary and advice re: 421-a |

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|----|-------------|------------------|------------------------------|--|-----|---|
| 30 | | NYCPRIVO 0501 | Attorney Client | Draft talking points re: 421-a - Homeless Preference | AC | Draft of document concerning homeless referrals to 421-a projects reflecting legal advice |
| 31 | | NYCPRIVO 2108 | Attorney Client;Deliberative | Email chain re: 421-a - Homeless Preference;Application of Community Preference | AC | communications reflecting legal advice re: 421-a |
| 32 | | NYCPRIVO 0106 | Attorney Client;Deliberative | Draft talking points re: 421-a - Homeless Preference | AC | Draft of documents concerning homeless referrals to 421-a projects reflecting legal advice sought |
| 33 | | NYCPRIVO 0108 | Attorney Client;Deliberative | Email chain re: 421-a - Homeless Preference | AC | emails with counsel and others; seeking legal advice in context of this litigation on communications plan re: homeless referrals to 421- a projects |
| 34 | | NYCPRIVO 0536 | Deliberative | Draft Document re: 421-a - Homeless Preference | DPP | draft document containing comments re: homeless prevention policy and 421-a housing; DO NOT PRODUCE UNDER RODRIGUEZ |
| 35 | | NYCPRIVO 0117 | Attorney Client | Draft talking points re: 421-a - Homeless Preference | AC | Attorney draft of documents discussing homeless referrals to 421- a projects |
| 36 | NYC_0033169 | | Attorney Client | Draft talking points re: 421-a - Homeless Preference | AC | Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects |
| 37 | | NYCPRIVO 0609 | Attorney Client | Email chain re: 421-a - Homeless Preference;Marketing guidelines | AC | Communications with counsel re: revisions to Marketing Handbook |
| 38 | | NYCPRIVO 0611 | Attorney Client | Email chain re: 421-a - Homeless Preference | AC | Communications with counsel re: revisions to Marketing Handbook |
| 39 | | NYCPRIVO 0613 | Attorney Client | Draft Document re: 421-a - Homeless Preference | AC | Attorney draft of memo sent to client for consideration re: homeless referrals to 421- a projects |
| 40 | | NYCPRIVO 0620 | Attorney Client | Draft report re: MIH - Anti- displacement strategies; 421-a - 2015/2016 revision | AC | Attorney draft of report on MIH with highlighted areas for discussion |

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| 41 | | NYCPRIVO 2115 | Deliberative | Draft Document re: Anti-displacement strategies;Community Opposition Strategies | DPP | internal working draft reflecting tentative positions on HPD RFPs and involvement in neighborhood studies; DO NOT PRODUCE UNDER RODRIGUEZ |
| 42 | | NYCPRIVO 0637 | Attorney Client | Draft talking points re: 421-a - 2007 revision | AC | Draft memo re: 421-a for which legal review is requested |
| 43 | | NYCPRIVO 0644 | Attorney Client | Final letter (non-public) re: 421-a - 2007 revision | NP | not conveying legal advice or seeking legal advice |
| 44 | | NYCPRIVO 0665 | Attorney Client;Deliberative | Draft Document re: Marketing guidelines | AC | Draft of Marketing Guidelines containing counsel's comments |
| 45 | | NYCPRIVO 0666 | Deliberative | Draft Document re: Marketing guidelines | DPP | draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ |
| 46 | | NYCPRIVO 0668 | Attorney Client | Email chain re: Anti-displacement strategies;Application of Community Preference | NP | communication with counsel and others re: CPP; not seeking or reflecting legal advice |
| 47 | | NYCPRIVO 0676 | Deliberative;Work Product | Draft letter re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | Draft letter to HUD re: potential settlement |
| 48 | | NYCPRIVO 0686 | Deliberative | Draft report re: Application of Community Preference | DPP | draft strategy document concerning 10-year affordable housing plan in East New York; DO NOT PRODUCE UNDER RODRIGUEZ |
| 49 | | NYCPRIVO 0768 | Legislative | Draft talking points re: ENY - Anti-displacement strategies | NP | internal strategy document regarding East New York development issues |
| 50 | | NYCPRIVO 0782 | Deliberative | Email chain re: Application of Community Preference | NP | not internal - communication with city counsel; |
| 51 | | NYCPRIVO 0783 | Attorney Client;Deliberative | Email chain re: Application of Community Preference | AC | communication to counsel and others seeking advice re: overlapping preference categories at a specific development |

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| 52 | | NYCPRIVO 0788 | Deliberative;Legislative | Draft presentation re: Anti-displacement strategies | DPP | draft internal presentation concerning legislative agenda, positions on 421-a and fall back positions on rent regulation and land tax; DO NOT PRODUCE UNDER RODRIGUEZ |
| 53 | | NYCPRIVO 0793 | Attorney Client;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | AC | communication discussing legal position in response to litigation and upcoming meeting with counsel |
| 54 | | NYCPRIVO 0799 | Deliberative;Legislative | Draft Document re: ENY - Anti-displacement strategies | NP | draft executive summary of affordable housing plan for East New York |
| 55 | | NYCPRIVO 0827 | Legislative | Draft talking points re: Anti-displacement strategies | NP | internal memo re: proposed responses to tenant harassment proposals by progressive caucus |
| 56 | | NYCPRIVO 0158 | Deliberative;Legislative | Email chain re: Anti-displacement strategies | NP | also concerns bill re: harassment of tenants |
| 57 | | NYCPRIVO 0835 | Deliberative;Legislative | Draft talking points re: ENY - Anti-displacement strategies | NP | internal memo reflecting decisionmaking re: issues to address re: East New York development |
| 58 | | NYCPRIVO 0159 | Deliberative | Email chain re: ENY - Anti-displacement strategies;Community Opposition Strategies | NP | internal communications re: East New York development and MIH strategy |
| 59 | | NYCPRIVO 0839 | Attorney Client;Work Product | Email chain re: Litigation - Other;AFFH and Community Preference | AC | document summarizes and conveys legal advice re: Consolidated Plan and ongoing litigation |
| 60 | | NYCPRIVO 0842 | Attorney Client;Work Product | Email chain re: Litigation - Other;AFFH and Community Preference | AC | communication with counsel re: draft 2012 Consolidated Plan to HUD re: AFFH |
| 61 | | NYCPRIVO 0844 | Deliberative;Work Product | Draft letter re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | Draft response to HUD |
| 62 | | NYCPRIVO 0846 | Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |

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| 63 | | NYCPRIVO 2140 | Deliberative | Draft Document re: Anti-displacement strategies;Community Opposition Strategies | DPP | same as 41 |
| 64 | | NYCPRIVO 0881 | Deliberative;Legislative | Draft Document re: MIH - Anti-displacement strategies; ENY - Anti-displacement strategies;ENY - City council input | NP | internal outline of remaining considerations regarding East New York development plan; |
| 65 | | NYCPRIVO 0889 | Deliberative;Legislative | Draft report re: Anti-displacement strategies | NP | Per City's Agreement |
| 66 | | NYCPRIVO 0891 | Deliberative;Legislative | Email chain re: Anti-displacement strategies | NP | Per City's Agreement |
| 67 | | NYCPRIVO 0904 | Deliberative | Final presentation (non-public) re: MIH - Anti-displacement strategies | NP | |
| 68 | | NYCPRIVO 0163 | Deliberative | Email chain re: ENY - Anti-displacement strategies | DPP | internal communications concerning East New York development positions; PRODUCE UNDER RODRIGUEZ |
| 69 | | NYCPRIVO 0690 | Attorney Client | Email chain re: Application of Community Preference | AC | communication with counsel and others re: legal requirements of 421-a and applicability of various regulations to specific development |
| 70 | | NYCPRIVO 0972 | Attorney Client;Deliberative | Email chain re: 421-a - 2015/2016 revision;421-a - Homeless Preference | AC | Legal advice re: 421-a |
| 71 | | NYCPRIVO 0973 | Attorney Client;Deliberative | Draft Document re: 421-a - 2015/2016 revision;421-a - Homeless Preference | AC | Legal advice re: 421-a |
| 72 | | NYCPRIVO 2768 | Deliberative | Draft talking points re: Application of Community Preference | NP | Per City's Agreement |
| 73 | | NYCPRIVO 2163 | Work Product | Final letter (non-public) re: Litigation - Anticipated Litigation re: Community Preference | NP | Letter to HUD providing fact information |
| 74 | | NYCPRIVO 1425 | Deliberative | Draft talking points re: Litigation - Winfield Litigation;Application of Community Preference | NP | Per City's Agreement |

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| 75 | | NYCPRIVO 1426 | Deliberative | Draft talking points re: Litigation - Winfield Litigation;Application of Community Preference | NP | Per City's Agreement |
| 76 | | NYCPRIVO 0699 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | communications re: data analysis needed to determine potential settlement positions with HUD on CPP |
| 77 | | NYCPRIVO 0701 | Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP | Communications concerning draft letter to HUD and alternatives to CPP |
| 78 | | | Deliberative;Work Product | Draft letter re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | Draft analysis of measures of demographics within CDs in connection with HUD submission |
| 79 | | NYCPRIVO 0708 | Work Product | Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference | WP | internal statistical analysis for informing litigation strategy |
| 80 | | NYCPRIVO 0709 | Attorney Client;Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | AC | Discloses topic of legal advice and responses to Plaintiffs' counsel and draft communication to HUD |
| 81 | | NYCPRIVO 0719 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform legal strategy |
| 82 | | NYCPRIVO 0720 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | communications re: data analysis needed to determine potential settlement positions with HUD on CPP |
| 83 | | NYCPRIVO 0724 | Deliberative | Internal Charts or Maps;Notes re: Anti-displacement strategies | DPP | CHART RE: PROGRESS ON VARIOUS STRATEGIC PRESERVATION INITIATIVES, REFLECTS INTERNAL WORKING PROCESS; DO NOT PRODUCE UNDER RODRIGUEZ |
| 84 | | NYCPRIVO 0731 | Deliberative | Draft presentation re: | DPP | SAME AS 52 |

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| 85 | | NYCPRIVO 0145 | Work Product | Draft report re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation | WP | Settlement analysis for considering options for CPP changes in connection with litigation |
| 86 | | NYCPRIVO 0146 | Deliberative; Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation | WP & DPP | analysis prepared to inform litigation strategy and settlement |
| 87 | | NYCPRIVO 0742 | Deliberative; Work Product (withdrawn) | Draft report re: Litigation - Anticipated Litigation re: Community Preference | DPP | Work product withdrawn; draft report re: MIH policy reflecting input from various individuals; precedes counsel vote on MIH; DO NOT PRODUCE UNDER RODRIGUEZ |
| 88 | | NYCPRIVO 0752 | Deliberative | Draft Document re: Marketing guidelines | DPP | draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ |
| 89 | | NYCPRIVO 0150 | Deliberative; Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform legal strategy and settlement |
| 90 | | NYCPRIVO 0994 | Deliberative | Draft Document re: Marketing guidelines | DPP | draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ |
| 91 | NYC_0076061 | NYCPRIVO 0997 | Deliberative | Draft Document re: Marketing guidelines | DPP | draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ |
| 92 | | NYCPRIVO 0999 | Attorney Client; Deliberative | Draft Document re: Marketing guidelines | AC | communications re: sections of 2016 Marketing Guidelines and attorney advice re: certain sections |
| 93 | | NYCPRIVO 1000 | Attorney Client; Deliberative | Email chain re: Application of Community Preference | AC | communications with counsel and others re: inclusion of prior residents in community preference for various projects |

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| 94 | | NYCPRIVO 1003 | Attorney Client | Email chain re: North Brooklyn Rezoning and Demographics | AC | communications with counsel re: requests to include prior residents in community preference, pre-policy discussion re: policy |
| 95 | | NYCPRIVO 2149 | Attorney Client;Deliberative | Email chain re: MIH - Anti-displacement strategies;MIH - Community opposition | NP | Per City's Agreement |
| 96 | | NYCPRIVO 1431 | Attorney Client;Legislative | Email chain re: City Council Input;Application of Community Preference | AC | communications discussing advice of counsel re: community preference with regard to specific project |
| 97 | | NYCPRIVO 2174 | Attorney Client;Deliberative;Legislative | Draft report re: MIH - Anti-displacement strategies;MIH - Community opposition;MIH - City council input;Community Opposition Strategies | AC | draft internal report concerning MIH and 421-a sent to counsel for legal comment |
| 98 | | NYCPRIVO 1438 | Legislative | Email chain re: Application of Community Preference | NP | communications about AMI and CPP as to specific development |
| 99 | | NYCPRIVO 1439 | Legislative | Email chain re: Application of Community Preference | NP | communications about AMI and CPP as to specific development |
| 100 | | NYCPRIVO 1441 | Attorney Client;Deliberative | Draft Document re: 421-a - Homeless Preference | AC | Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP |
| 101 | | NYCPRIVO 2175 | Deliberative | Email chain re: Application of Community Preference | NP | communications regarding CPP |
| 102 | | NYCPRIVO 1442 | Legislative | Email chain re: Application of Community Preference | NP | communications about Bronx Commons development |
| 103 | | NYCPRIVO 0180 | Deliberative | Internal Memorandum re: 421-a - Homeless Preference | DPP | draft decision memo to mayor re: homeless unit commitment; DO NOT PRODUCE UNDER RODRIGUEZ |
| 104 | | NYCPRIVO 0189 | Deliberative;Work Product | Email chain re: Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference | WP & DPP | communications concerning information needed to evaluate changes to CPP and settlement position with HUD |

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| 105 | | NYCPRIVO 0191 | Deliberative | Draft report re: MIH - mobility | DPP | SAME AS 87 |
| 106 | | NYCPRIVO 1510 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | NP | Per City's Agreement |
| 107 | | NYCPRIVO 1511 | Deliberative | Draft talking points re: Anti-displacement strategies | NP | Per City's Agreement |
| 108 | | NYCPRIVO 1540 | Deliberative | Email chain re: Anti-displacement strategies;Application of Community Preference | NP | Per City's Agreement |
| 109 | | NYCPRIVO 1549 | Attorney Client;Deliberative | Internal Memorandum re: Commitment to Fair Housing | AC | Draft decision memo on MIH and stating understanding of legal advice |
| 110 | | NYCPRIVO 1556 | Attorney Client;Deliberative;Work Product | Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference | AC | draft decision memo to mayor on creation of MIH program containing and seeking legal advice |
| 111 | | NYCPRIVO 1578 | Deliberative;Legislative | Email chain re: Application of Community Preference | NP | communication regarding inquiry about application of CPP |
| 112 | | NYCPRIVO 1584 | Deliberative;Legislative | Email chain re: Application of Community Preference | NP | communication regarding inquiry about application of CPP |
| 113 | | NYCPRIVO 1591 | Attorney Client;Deliberative | Email chain re: ENY - Anti-displacement strategies;Application of Community Preference | AC | communication with counsel re: legal advice on language in draft document concerning CPP |
| 114 | | NYCPRIVO 1592 | Attorney Client;Deliberative | Email chain re: ENY - Anti-displacement strategies;Application of Community Preference | AC | communication with counsel re: legal advice on language in draft document concerning CPP |
| 115 | | NYCPRIVO 0206 | Deliberative | Draft Internal Memorandum re: Anti-displacement strategies | DPP | draft decision memo to mayor re: legal services RFP; DO NOT PRODUCE UNDER RODRIGUEZ |
| 116 | | NYCPRIVO 1617 | Deliberative | Draft presentation re: MIH - Anti-displacement strategies;MIH - Community opposition;MIH - City council input | DPP | internal draft of considerations for MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ |

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| 117 | | NYCPRIVO 1620 | Deliberative | Draft presentation re: MIH - Anti-displacement strategies;MIH - Community opposition;MIH - City council input | DPP | internal draft of considerations for MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ |
| 118 | NYC_0073100 | | Deliberative;Work Product | Email chain re: Litigation - Winfield Litigation | WP | Communications regarding this litigation and statement about it to provide to HUD |
| 119 | | NYCPRIVO 0220 | Deliberative | Draft talking points re: 421-a - Homeless Preference | NP | Per City's Agreement |
| 120 | | NYCPRIVO 1659 | Attorney Client;Deliberative | Draft talking points re: 421-a - Homeless Preference | AC | internal draft talking points in advance of meeting with REBNY containing attorney input and strategy |
| 121 | | NYCPRIVO 1661 | Deliberative | Email chain re: ENY - Anti-displacement strategies;Community Opposition Strategies | DPP | internal communications re: non-final talking points about non-final commitments in advance of release of Inwood Development Plan; DO NOT RELEASE UNDER RODRIGUEZ |
| 122 | | NYCPRIVO 1662 | Attorney Client | Email chain re: 421-a - Homeless Preference | AC | Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP |
| 123 | | NYCPRIVO 1663 | Attorney Client | Email chain re: 421-a - Homeless Preference | AC | Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP |
| 124 | | NYCPRIVO 1666 | Work Product | Email chain re: Litigation - Winfield Litigation | NP | Per City's Agreement |
| 125 | | NYCPRIVO 1667 | Deliberative;Work Product | Email chain re: Anti-displacement strategies; Litigation - Winfield Litigation | NP | Per City's Agreement |
| 126 | | NYCPRIVO 1723 | Attorney Client;Deliberative | Email chain re: Application of Community Preference | AC | communication with counsel and others seeking legal advice on homeless referrals to a specific project |
| 127 | | NYCPRIVO 1026 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | Discussion about how to conduct data analysis to answer HUD request |

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| 128 | | NYCPRIVO 1726 | Attorney Client;Deliberative | Email chain re: Application of Community Preference | NP | email seeking legal advice, among other input, on a specific application of CPP |
| 129 | | NYCPRIVO 1034 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | analysis to inform litigation strategy |
| 130 | | NYCPRIVO 0237 | Attorney Client;Deliberative | Email chain re: 421-a - Homeless Preference;Application of Community Preference | NP | Per City's Agreement |
| 131 | | NYCPRIVO 1037 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | summary of info discussed at settlement meeting with HUD re: HUD data requests for alternative to CPP |
| 132 | | NYCPRIVO 1737 | Deliberative;Legislative | Email chain re: ENY - Anti-displacement strategies | DPP | internal communications re: East New York development and strategy; DO NOT PRODUCE UNDER RODRIGUEZ |
| 133 | | NYCPRIVO 1039 | Deliberative (withdrawn);Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP | information and data collected to inform settlement strategy with HUD |
| 134 | | NYCPRIVO 1058 | Deliberative;Work Product | Draft report re: Anti-displacement strategies; Litigation - Winfield Litigation | WP | Draft PPT re: alternatives to CPP to inform strategy in litigation |
| 135 | | NYCPRIVO 1066 | Deliberative;Work Product | Internal Charts or Maps re: Anti-displacement strategies | WP | email re: gentrification map in connection with planning changes to CPP for settlement |
| 136 | | NYCPRIVO 1067 | Attorney Client;Deliberative | Draft report re: Marketing guidelines | AC | revisions to Marketing handbook sent to counsel for comment |
| 137 | | NYCPRIVO 1070 | Deliberative;Work Product | Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation | WP & DPP | gentrification map for planning changes to CPP for settlement |
| 138 | | NYCPRIVO 1071 | Deliberative;Work Product | Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation | WP & DPP | gentrification map for planning changes to CPP for settlement |
| 139 | | NYCPRIVO 1075 | Attorney Client;Legislative;Work Product | Email chain re: City Council Input; Litigation - Anticipated Litigation re: Community Preference | AC | email chain with counsel and others re: response to Plaintiff's counsel and draft letter to HUD |

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| 140 | NYC_0076236 | NYCPRIVO 1117 | Attorney Client;Deliberative;Work Product | Draft presentation re: Litigation - Anticipated Litigation re: Community Preference;Neighborhood Demographics | AC | document discussing strategies for negotiations with HUD re: community preference; legal advice on document sought |
| 141 | | NYCPRIVO 1122 | Attorney Client;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;AFFH and Community Preference | WP & DPP | ppt re: option for analyzing various aspects of CDs in connection with changes to CPP as part of litigation |
| 142 | | NYCPRIVO 2150 | Attorney Client | Email chain;Draft Document re: OTHER | AC | communications identifying portions of draft document where legal advice is sought and discussing legal review of same |
| 143 | | NYCPRIVO 1222 | Deliberative;Legislative | Email chain re: Anti-displacement strategies | DPP | internal communications re: East New York development and MIH strategy; DO NOT PRODUCE UNDER RODRIGUEZ |
| 144 | | NYCPRIVO 1231 | Deliberative | Email chain re: Anti-displacement strategies;Application of Community Preference | NP | email re: application of CPP |
| 145 | | NYCPRIVO 1292 | Deliberative | Email chain re: Community Opposition Strategies | DPP | communications concerning preliminary responses to community questions about Community Housing Plan - PRODUCE UNDER RODRIGUEZ |
| 146 | | NYCPRIVO 1294 | Deliberative | Notes re: Anti-displacement strategies;Commitment to Fair Housing | DPP | internal notes reflecting Meltzer's thoughts on contract with NEIGHBORHOOD PRESERVATION CONSULTANT program and displacement mitigation strategies - PRODUCE UNDER RODRIGUEZ |
| 147 | | NYCPRIVO 1298 | Deliberative | Draft report re: ENY - Anti-displacement strategies;ENY - Community opposition | NP | Per City's Agreement |

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| 148 | | NYCPRIVO 1302 | Deliberative | Final report (non-public);Draft Document re: Anti-displacement strategies | DPP | concept paper in advance of RFP for Neighborhood Preservation Consultant contract to assist HPD in preserving affordable housing stock; lays out goals, elements and parameters of new model for program - not final parameters of program - DO NOT PRODUCE UNDER RODRIGUEZ |
| 149 | | NYCPRIVO 2151 | Work Product | Email chain re: Litigation - Winfield Litigation | WP | Concerns literature review on gentrification and economic diversity; FOR SETTLEMENT |
| 150 | | NYCPRIVO 1342 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Settlement analysis for considering options for CPP changes in connection with litigation |
| 151 | | NYCPRIVO 1349 | Deliberative;Work Product | Email chain re: Litigation - Winfield Litigation | WP & DPP | email discussion regarding options for changes to CPP in connection with settlement positions |
| 152 | | NYCPRIVO 1353 | Deliberative | Email chain re: MIH - Anti-displacement strategies | DPP | communications setting forth preliminary thoughts about creation of HousingStat (a computer program to help officials and nonprofits prevent displacement and protect stock of affordable housing) - DO NOT PRODUCE UNDER RODRIGUEZ |
| 153 | | NYCPRIVO 1358 | Deliberative;Work Product | Email chain re: Litigation - Winfield Litigation | WP & DPP | email discussion re: settlement positions on CPP |
| 154 | | NYCPRIVO 2153 | Work Product | Email chain re: Litigation - Winfield Litigation | WP | Communication about work needed to inform legal strategy |
| 155 | | NYCPRIVO 2154 | Work Product | Notes re: Anti-displacement strategies; Litigation - Winfield Litigation | WP | Summary of fact research done for litigation and reflects litigation strategy |
| 156 | | NYCPRIVO 1366 | Deliberative;Work Product | Email chain re: Litigation - Winfield Litigation | WP & DPP | email discussion re: settlement positions on CPP |
| 157 | | NYCPRIVO 1367 | Deliberative;Work Product | Email chain re: Litigation - Winfield Litigation | WP & DPP | email discussion re: settlement positions on CPP |

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| 158 | | NYCPRIVO 1374 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | email discussion re: settlement positions on CPP |
| 159 | | NYCPRIVO 1375 | Attorney Client;Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | AC | communications with counsel and others re: legal strategy and defenses |
| 160 | | NYCPRIVO 1377 | Work Product | Email chain re: Litigation - Winfield Litigation | WP | Describes work done for informing litigation and settlement strategy |
| 161 | | NYCPRIVO 1378 | Deliberative;Work Product | Draft Internal Memorandum re: Litigation - Winfield Litigation | WP & DPP | legal materials re: settlement positions |
| 162 | | NYCPRIVO 1384 | Deliberative;Work Product | Draft Internal Memorandum re: Litigation - Winfield Litigation | WP & DPP | legal materials re: settlement positions |
| 163 | | NYCPRIVO 1746 | Attorney Client | Email chain re: Application of Community Preference | AC | communications with counsel and others re: draft statement about community preference |
| 164 | | NYCPRIVO 1386 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation | WP & DPP | legal materials re: settlement positions |
| 165 | | NYCPRIVO 1392 | Attorney Client;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | legal materials re: settlement positions |
| 166 | | NYCPRIVO 1398 | Attorney Client;Work Product | Email chain re: Litigation - Winfield Litigation | WP | legal materials re: settlement positions |
| 167 | | NYCPRIVO 1399 | Work Product | Email chain re: Litigation - Winfield Litigation | WP | Describes work done for informing litigation and settlement strategy |
| 168 | | NYCPRIVO 1752 | Deliberative | Draft Document re: Marketing guidelines | DPP | draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ |
| 169 | | NYCPRIVO 0245 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP | communications concerning legislative history of CPP and search for same |
| 170 | | NYCPRIVO 0263 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | communications concerning potential changes to CPP in context of settlement discussion with HUD; DO NOT PRODUCE UNDER RODRIGUEZ |

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| 171 | | NYCPRIVO 0264 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | analysis to inform litigation strategy and settlement |
| 172 | | NYCPRIVO 0265 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP | communications concerning letter to HUD re: alternatives to CPP |
| 173 | | NYCPRIVO 1760 | Deliberative;Legislative | Email chain re: City Council Input;Application of Community Preference | NP | communicatons concerning development at 168th St. and response to counsel member concerns |
| 174 | | NYCPRIVO 0274 | Deliberative | Draft presentation re: Anti- displacement strategies; 421-a - 2015/2016 revision | DPP | Same as 52 |
| 175 | | NYCPRIVO 0278 | Attorney Client | Email chain re: Application of Community Preference | AC | communication with counsel and others seeking advice on application of preferences at a specific development |
| 176 | | NYCPRIVO 0280 | Attorney Client;Deliberative;Work Product | Final letter (non-public) re: Litigation - Anticipated Litigation re: Community Preference | DPP | Not attorney-client because sent to HUD; Letter from Been to HUD GC re: Settlement Proposal; DO NOT PRODUCE UNDER RODRIGUEZ |
| 177 | | NYCPRIVO 0281 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 178 | | NYCPRIVO 0292 | Attorney Client;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | AC & WP | Communication with counsel; discussion anticipated litigation, FOIL request and potential fact development for litigation |
| 179 | | NYCPRIVO 0293 | Legislative | Email chain re: Application of Community Preference | NP | emails between Garodnick and Been re: CPP |
| 180 | | NYCPRIVO 0295 | Work Product | Email chain re: Litigation - Winfield Litigation | NP | draft communication to mayor about filing of this suit |
| 181 | | NYCPRIVO 0306 | Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP | communications about this litigation and providing statement to HUD re: same |

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| 182 | | NYCPRIVO 0309 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 183 | | NYCPRIVO 0321 | Work Product | Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference | WP | Analysis of ACS demographic and housing estimates based on census tracts |
| 184 | | NYCPRIVO 0322 | Work Product | Draft Internal Memorandum re: Litigation - Winfield Litigation | WP | Atty questions re: CPP and statistical tests |
| 185 | NYC_0072746 | NYCPRIVO 0329 | Deliberative;Work Product | Draft letter re: Litigation - Anticipated Litigation re: Community Preference | WP | Draft Letter from Been to HUD GC re: settlement |
| 186 | | NYCPRIVO 1780 | Attorney Client | Final report (non-public) re: Marketing guidelines | NP | |
| 187 | | NYCPRIVO 1791 | Deliberative | Draft Document re: Marketing guidelines | DPP | draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ |
| 188 | | NYCPRIVO 0338 | Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP | Internal communication regarding analysis of litigation risk and settlement possibility with HUD |
| 189 | | NYCPRIVO 0339 | Deliberative | Email chain re: Litigation - Anticipated Litigation re: Community Preference | DPP | communications about potential changes to CPP and communications with CM Greenfield - PRODUCE UNDER RODRIGUEZ |
| 190 | | NYCPRIVO 0340 | Attorney Client | Email chain re: Application of Community Preference;Community Opposition Strategies | AC | communication with counsel and other seeking advice re: public statement about CPP |
| 191 | | NYCPRIVO 0341 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP | Communications with HUD and then internal communications re: settlement discussions with HUD re: CPP |
| 192 | | NYCPRIVO 0342 | Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | communication concerning proposed communication with HUD re: alternatives to CPP |

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| 193 | | NYCPRIVO 0345 | Attorney Client;Deliberative | Draft Internal Memorandum re: AFFH and Community Preference;Community Opposition Strategies | AC | decision memo to Mayor making recommendations and conveying legal advice re: rezoning in specific neighborhood |
| 194 | | NYCPRIVO 1835 | Attorney Client;Deliberative | Internal Memorandum re: Commitment to Fair Housing | AC | Decision memo to Mayor re: rezoning in specific neighborhoods and containing legal advice |
| 195 | | NYCPRIVO 1841 | Work Product | Final report (non-public) re: Litigation - Winfield Litigation | WP | Notes on property portfolios and includes Winfield litigation strategy comments |
| 196 | | NYCPRIVO 0351 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 197 | | NYCPRIVO 0352 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 198 | | NYCPRIVO 0353 | Work Product | Draft presentation re: Litigation - Winfield Litigation | WP | Legal communication and analysis of case |
| 199 | | NYCPRIVO 0354 | Deliberative;Work Product | Notes re: 421-a - 2015/2016 revision; Litigation - Winfield Litigation | WP & DPP | Notes concerning considerations for determining policy regarding 421a and changes to law |
| 200 | | NYCPRIVO 0355 | Deliberative;Work Product | Notes re: Litigation - Winfield Litigation | WP | list of questions to consider re: possible changes to CPP |
| 201 | | NYCPRIVO 0356 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 202 | | NYCPRIVO 0363 | Deliberative | Draft Internal Memorandum re: Anti-displacement strategies | DPP | internal draft re: preservation initiatives; DO NOT PRODUCE UNDER RODRIGUEZ |
| 203 | | NYCPRIVO 0367 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |

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| 204 | | NYCPRIVO 0368 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 205 | | NYCPRIVO 0378 | Work Product | Draft Internal Memorandum re: Litigation - Winfield Litigation | WP | Legal analysis and settlement strategies |
| 206 | | NYCPRIVO 0379 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Settlement analysis for considering options for CPP changes in connection with litigation |
| 207 | | NYCPRIVO 0380 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Settlement analysis for considering options for CPP changes in connection with litigation |
| 208 | | NYCPRIVO 0382 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Settlement analysis for considering options for CPP changes in connection with litigation - MAP |
| 209 | | NYCPRIVO 0391 | Work Product | Draft presentation re: Litigation - Winfield Litigation | WP | Legal analysis and settlement strategies |
| 210 | | NYCPRIVO 0392 | Deliberative;Work Product | Draft letter re: Litigation - Anticipated Litigation re: Community Preference | WP | Draft Letter from Been to HUD GC re: settlement |
| 211 | | NYCPRIVO 0393 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Settlement analysis for considering options for CPP changes in connection with litigation - MAP |
| 212 | | NYCPRIVO 0394 | Deliberative | Draft talking points re: 421-a - Homeless Preference | NP | draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a |
| 213 | | NYCPRIVO 0395 | Deliberative | Draft talking points re: 421-a - Homeless Preference | NP | draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a |
| 214 | | NYCPRIVO 0396 | Deliberative | Draft talking points re: 421-a - Homeless Preference | NP | draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a |
| 215 | | NYCPRIVO 0402 | Deliberative;Legislative | Draft talking points re: MIH - Anti-displacement strategies | DPP | same as 83 |
| 216 | | NYCPRIVO 1843 | Attorney Client;Deliberative | Internal Memorandum re: 421-a - 2015/2016 revision | AC | legal summary for client re: 421-a |

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| 217 | | NYCPRIVO 1850 | Deliberative | Draft report re: Application of Community Preference;Marketing guidelines | DPP | draft section of marketing handbook; DO NOT PRODUCE UNDER RODRIGEZ |
| 218 | | NYCPRIVO 1855 | Attorney Client;Deliberative | Internal Memorandum re: 421-a - Homeless Preference | AC | Memo reflecting opinions of HPD Legal Affairs and Law Department on tenant selection and requested for determining policy re: same |
| 219 | | NYCPRIVO 1863 | Deliberative | Draft talking points re: Anti-displacement strategies | NP | draft Q&As re: affordable housing in connection with 2015 mayor state of city address |
| 220 | NYC_0067398 | | Work Product | Draft Document re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP | Draft questions for analysis for formulating litigation strategy |
| 221 | NYC_0067400 | | Deliberative;Work Product | Draft Internal Memorandum re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 222 | NYC_0067402 | | Deliberative;Work Product | Draft Internal Memorandum re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 223 | NYC_0067405 | | Work Product | Final presentation (non-public) re: Litigation - Winfield Litigation | WP | Legal communication and analysis of case |
| 224 | NYC_0067416 | | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 225 | NYC_0067418 | | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference | WP & DPP | analysis to inform litigation strategy and settlement |
| 226 | NYC_0067422 | | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 227 | NYC_0067424 | | Deliberative;Work Product | Notes re: Litigation - Anticipated Litigation re: Community Preference | WP | notes reflect communications with HUD re: settlement of issues raised about CPP |
| 228 | NYC_0067425 | | Work Product | Notes re: Litigation - Winfield Litigation | WP | Reflects attorney questions and information gathering for litigation |
| 229 | NYC_0067426 | | Work Product | Notes re: Litigation - Winfield Litigation | WP | Reflects potential analyses for informing litigation strategy |

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| 230 | NYC_0067431 | | Work Product | Draft presentation re: Litigation - Winfield Litigation | WP | Draft presentation re: litigation for informing litigation strategy |
| 231 | NYC_0067438 | | Deliberative | Draft talking points re: MIH - Community opposition; Anti-displacement strategies; Commitment to Fair Housing | NP | Notes for discussion with NYT about fair housing; does not reflect decisionmaking on policy |
| 232 | | NYCPRIVO 1867 | Attorney Client; Legislative (Withdrawn); Deliberative | Email chain re: Application of Community Preference | AC | Withdraw legislative privilege; adding DPP; communications with counsel and others to provide legal advice regarding proposed application of CPP to displaced tenants of Greenpoint/Williamsburg |
| 233 | | NYCPRIVO 1874 | Attorney Client; Deliberative | Draft report re: Application of Community Preference | NP | Per City's Agreement |
| 234 | | NYCPRIVO 1882 | Deliberative | Draft report re: Anti-displacement strategies | DPP | draft of proposed new housing marketplace plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 235 | | NYCPRIVO 1884 | Attorney Client | Email chain re: Application of Community Preference | AC | communications with counsel discussing potential legislation and conveying legal advice |
| 236 | | NYCPRIVO 2774 | Deliberative | Draft report re: Litigation - Winfield Litigation; Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 237 | | NYCPRIVO 2775 | Deliberative | Draft report re: Litigation - Winfield Litigation; Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 238 | | NYCPRIVO 2782 | Attorney Client; Deliberative | Draft report re: Commitment to Fair Housing | AC & DPP | draft of 2016 consolidated plan re: AFFH sent to counsel for comments |
| 239 | | NYCPRIVO 2783 | Attorney Client; Deliberative | Draft report re: Commitment to Fair Housing | AC & DPP | draft of 2016 consolidated plan re: AFFH sent to counsel for comments |
| 240 | | NYCPRIVO 2784 | Attorney Client; Deliberative | Draft report re: AFFH and Community Preference | AC & DPP | draft of 2016 consolidated plan re: AFFH sent to counsel for |
| 241 | | NYCPRIVO 2785 | Attorney Client; Deliberative | Draft report re: AFFH and Community Preference; Commitment to Fair Housing | AC & DPP | draft of 2016 consolidated plan re: AFFH sent to counsel for comments |

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| 242 | | NYCPRIVO 2797 | Attorney Client;Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | AC & DPP | draft of 2016 consolidated plan sections re: AFFH sent to counsel for comments |
| 243 | | NYCPRIVO 2800 | Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 244 | | NYCPRIVO 2807 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for Fair Housing Statement to be included in AFFH Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 245 | | NYCPRIVO 2812 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | AC & DPP | draft submission to HUD re AFFH seeking comments from multiple agencies to submit to legal |
| 246 | | NYCPRIVO 2825 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 247 | | NYCPRIVO 2828 | Deliberative | Email chain re: Commitment to Fair Housing | NP | email re: language for inclusion in AFFH document RE: 5-yr needs for HPD Fair Housing Program |
| 248 | | NYCPRIVO 2832 | Attorney Client;Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | AC & DPP | draft of 2010 AFFH statement for HUD sent to counsel for comments |
| 249 | | NYCPRIVO 2859 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 250 | | NYCPRIVO 2885 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | AC & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 251 | | NYCPRIVO 2897 | Attorney Client;Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | AC & DPP | draft of 2012 consolidated plan re: AFFH sent to counsel for comments |
| 252 | | NYCPRIVO 2899 | Deliberative | Draft report re: Anti-displacement strategies | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |

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| 253 | | NYCPRIVO 2905 | Attorney Client;Work Product | Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;Commitment to Fair Housing | NP | Excerpt AFFH update from 2011 consolidated plan |
| 254 | | NYCPRIVO 2906 | Attorney Client;Work Product | Final report (non-public) re: Litigation - Winfield Litigation;Commitment to Fair Housing | NP | 2011 consolidated plan re: AFFH to HUD |
| 255 | | NYCPRIVO 2911 | Attorney Client;Work Product | Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;Commitment to Fair Housing | NP | Per City's Agreement |
| 256 | | NYCPRIVO 2913 | Attorney Client;Deliberative | Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing | AC & DPP | draft of 2013 consolidated plan re: AFFH sent to counsel for comments |
| 257 | | NYCPRIVO 2924 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft sections for 2013 Consolidated Plan AFFH; DO NOT PRODUCE UNDER RODRIGUEZ |
| 258 | | NYCPRIVO 2939 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 259 | | NYCPRIVO 2943 | Attorney Client;Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Other;AFFH and Community Preference;Commitment to Fair Housing | AC | Communication with attorney re: draft submission to HUD and legal issues re: same |
| 260 | | NYCPRIVO 2953 | Attorney Client;Work Product | Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;((Litigation)) | NP | 2007 Final Consolidated Plan AFFH Annual Performance Report to HUD |
| 261 | | NYCPRIVO 2954 | Attorney Client;Deliberative;Work Product | Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;Commitment to Fair Housing | NP | Excerpt AFFH update from 2008 consolidated plan |
| 262 | | NYCPRIVO 2967 | Deliberative | Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |

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| 263 | | NYCPRIVO 2968 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 264 | | NYCPRIVO 2969 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 265 | | NYCPRIVO 2970 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 266 | | NYCPRIVO 2973 | Attorney Client;Deliberative | Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing | AC & DPP | draft of portion of AFFH- related document sent to counsel for comments |
| 267 | NYC_0085477 | NYCPRIVO 3002 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 268 | NYC_0085478 | NYCPRIVO 3003 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 270 | | NYCPRIVO 3015 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 271 | | NYCPRIVO 3016 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 272 | | NYCPRIVO 3025 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 273 | | NYCPRIVO 3055 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 274 | | NYCPRIVO 3070 | Attorney Client;Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Other;AFFH and Community Preference;Commitment to Fair Housing | AC & WP | Communication with attorney re: draft submission to HUD and legal issues re: same |

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| 275 | | NYCPRIVO 3093 | Attorney Client;Deliberative;Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Other;AFFH and Community Preference;Commitment to Fair Housing | AC & WP | Communication with attorney re: draft submission to HUD and legal issues re: same |
| 276 | | NYCPRIVO 3122 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 277 | | NYCPRIVO 3124 | Deliberative | Email chain re: Commitment to Fair Housing | DPP | email re: language for inclusion in AFFH document RE: 5-year nees for HPD Fair Housing Program; DO NOT PRODUCE PURSUANT TO RODRIGUEZ |
| 278 | | NYCPRIVO 3126 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 279 | | NYCPRIVO 3131 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 280 | | NYCPRIVO 3149 | Deliberative | Draft report re: Neighborhood Demographics;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 281 | NYC_0085800 | NYCPRIVO 3157 | Work Product | Draft report re: Litigation - Anticipated Litigation re: Community Preference;Application of Community Preference | WP | Internal communication concerning resonse to plaintiff's counsel's letter re: AFFH |
| 282 | | NYCPRIVO 3182 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments do multiple agencies to submit to legal |
| 283 | | NYCPRIVO 3185 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 284 | | NYCPRIVO 3202 | Attorney Client;Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |

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| 285 | | NYCPRIVO 3212 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 286 | | NYCPRIVO 3226 | Deliberative | Draft report re: Neighborhood Demographics; Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 287 | NYC_0085811 | NYCPRIVO 3235 | Attorney Client; Deliberative | Draft report re: Neighborhood Demographics; Commitment to Fair Housing | AC | Draft of information for 2012 consolidated plan submitted to attorneys for advice |
| 288 | NYC_0085819 | NYCPRIVO 3237 | Attorney Client; Deliberative; Work Product | Email chain re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Other; AFFH and Community Preference; Commitment to Fair Housing | AC & WP | Communication with attorney re: draft submission to HUD and legal issues re: same |
| 289 | | NYCPRIVO 3240 | Attorney Client; Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 290 | | NYCPRIVO 3250 | Deliberative | Draft letter re: Anti-displacement strategies; Commitment to Fair Housing | DPP | draft of strategic plan for 2015-2019 and potential actions for Consolidated Plan years; DO NOT PRODUCE UNDER RODRIGUEZ |
| 291 | | NYCPRIVO 3264 | Attorney Client; Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal |
| 292 | | NYCPRIVO 3265 | Attorney Client; Deliberative | Draft report re: Commitment to Fair Housing | WP & DPP | draft submission to HUD re AFFH seeking comments do multiple agencies to submit to legal |
| 293 | | NYCPRIVO 3277 | Attorney Client (withdrawn); Deliberative | Draft report re: Anti-displacement strategies; Commitment to Fair Housing | DPP | AC withdrawn; draft of housing plan; final publicly available; DO NOT PRODUCE UNDER RODRIGUEZ |
| 294 | | NYCPRIVO 3280 | Deliberative | Draft report re: Anti-displacement strategies; Commitment to Fair Housing | DPP | working draft for anticipated 10-year affordable housing plan; DO NOT PRODUCE UNDER RODRIGUEZ |

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| 295 | | NYCPRIVO 3283 | Attorney Client;Deliberative | Draft talking points re: Anti-displacement strategies;Commitment to Fair Housing | AC & DPP | draft of Q&As re: not yet final housing plan sent to counsel for review and comment |
| 296 | | NYCPRIVO 3284 | Deliberative | Draft report re: MIH - mobility | DPP | draft outline concerning MIH policy considerations and action items; DO NOT PRODUCE UNDER RODRIGUEZ |
| 297 | | NYCPRIVO 3294 | Deliberative | Draft talking points re: Anti-displacement strategies;Commitment to Fair Housing | NP | draft Q&A re: 10-year housing plan under deBlasio and MIH |
| 298 | | NYCPRIVO 1896 | Attorney Client;Deliberative | Draft Document re: MIH - mobility | AC & DPP | communication with counsel and others seeking comments on draft document re: MIH |
| 299 | NYC_0080435 | NYCPRIVO 3314 | Deliberative | Final report (non-public) re: Anti-displacement strategies | NP | Strategy slide re: East NY Community Plan and Housing NY |
| 300 | | NYCPRIVO 3319 | Attorney Client;Deliberative | Draft Internal Memorandum re: MIH - Anti-displacement strategies;Application of Community Preference | AC & DPP | draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice |
| 301 | | NYCPRIVO 3337 | Deliberative | Email chain re: 421-a - 2015/2016 revision | DPP | communications re: policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ |
| 302 | | NYCPRIVO 3347 | Deliberative | Email chain re: Neighborhood Demographics | NP | emails concerning presentation for Oct. 23 retreat |
| 303 | | NYCPRIVO 3348 | Deliberative | Draft report re: Neighborhood Demographics | NP | Per City's Agreement |
| 304 | | NYCPRIVO 3359 | Deliberative | Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics | NP | transition memo re: development in various neighborhoods |
| 305 | | NYCPRIVO 3369 | Deliberative | Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition | NP | letter from office of comptroller to city planning re: East NY Community plan and MIH |
| 306 | | NYCPRIVO 3370 | Attorney Client;Deliberative | Draft report re: MIH - Anti-displacement strategies;Application of Community Preference | AC & DPP | draft of possible modifications to MIH plan submitted to counsel for advice and comment |
| 307 | | NYCPRIVO 3373 | Deliberative | Draft letter re: MIH - Anti-displacement strategies;MIH - Community opposition | NP | Per City's Agreement |

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| 308 | | NYCPRIVO 3374 | Deliberative | Draft letter re: ENY - Anti-displacement strategies;ENY - Community opposition;ENY - Investment in Communities | DPP | internal draft letter in response to comptroller concerns re: East NY Community plan and MIH; produce final; draft DO NOT PRODUCE UNDER RODRIGUEZ |
| 309 | | NYCPRIVO 3390 | Deliberative | Final letter (non-public) re: Community Opposition Strategies | NP | letter from City Counsel re: rezoning in Bushwick |
| 310 | | NYCPRIVO 3396 | Deliberative | Draft talking points re: ENY - Anti-displacement strategies;ENY - Investment in Communities;Application of Community Preference | NP | |
| 311 | | NYCPRIVO 3406 | Deliberative | Draft talking points re: MIH - Anti-displacement strategies | NP | presentation to mayor in advance for a town hall meeting |
| 312 | | NYCPRIVO 3407 | Deliberative | Final talking points (non-public) re: MIH - Anti-displacement strategies;421-a - Homeless Preference | NP | Q&As for meeting on senior housing |
| 313 | | NYCPRIVO 3410 | Deliberative | Draft report re: ENY - Anti-displacement strategies;ENY - Community opposition | NP | draft of East NY affordable housing plan seeking public input to refine plan for public review |
| 314 | | NYCPRIVO 3413 | Deliberative | Draft report re: Neighborhood Demographics | DPP | draft memo including recommendations for land use, zoning, and other matters in connection with affordable housing in East New York; DO NOT PRODUCE UNDER RODRIGUEZ |
| 315 | | NYCPRIVO 3415 | Deliberative | Draft report re: Neighborhood Demographics | DPP | SAME AS 314 |
| 316 | NYC_0081650 | NYCPRIVO 3416 | Deliberative | Draft report re: Anti-displacement strategies | DPP | highlighted internal summary of possible changes to policies affecting affordable housing in Crown Heights West; DO NOT PRODUCE UNDER RODRIGUEZ |
| 317 | | NYCPRIVO 3417 | Deliberative | Draft report re: Neighborhood Demographics | DPP | SAME AS 314 |
| 318 | | NYCPRIVO 3418 | Deliberative | Draft report re: Neighborhood Demographics | DPP | SAME AS 314 |

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| 319 | | NYCPRIVO 3419 | Deliberative | Draft report re: Neighborhood Demographics | DPP | SAME AS 314 |
| 320 | | NYCPRIVO 3420 | Deliberative | Draft report re: Neighborhood Demographics | DPP | SAME AS 314 |
| 321 | | NYCPRIVO 3422 | Attorney Client | Email chain re: Application of Community Preference | NP | not conveying legal advice or seeking legal advice |
| 322 | | NYCPRIVO 3426 | Deliberative | Draft report re: Application of Community Preference | DPP | Project briefing memo for Hunter's Point South development for decisionmaking concerning affordable housing strategies in neighborhood; DO NOT PRODUCE UNDER RODRIGUEZ |
| 323 | | NYCPRIVO 1910 | Deliberative;Work Product (withdrawn) | Draft presentation re: Litigation - Anticipated Litigation re: Community Preference | DPP | Withdrawing WP; draft of Fair Housing Assessment Tool outline reflecting internal thoughts regarding how to comply with 2015 rule change; DO NOT PRODUCE UNDER RODRIGUEZ |
| 324 | | NYCPRIVO 3430 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 325 | | NYCPRIVO 3436 | Deliberative | Draft report re: Anti- displacement strategies;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 326 | | NYCPRIVO 3456 | Deliberative | Draft report re: Anti- displacement strategies | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 327 | | NYCPRIVO 1911 | Deliberative | Final report (non-public) re: Anti-displacement strategies | NP | report on public housing needs |
| 328 | | NYCPRIVO 3478 | Work Product | Draft report re: Litigation - Anticipated Litigation re: Community Preference;Application of Community Preference | NP | Per City's Agreement |

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| 329 | | NYCPRIVO 3481 | Deliberative | Draft report re: Anti-displacement strategies;Neighborhood Demographics;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 330 | | NYCPRIVO 3487 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 331 | | NYCPRIVO 3499 | Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 332 | | NYCPRIVO 3590 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 333 | | NYCPRIVO 3600 | Deliberative | Internal Memorandum re: AFFH and Community Preference | NP | |
| 334 | | NYCPRIVO 3634 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 335 | | NYCPRIVO 3703 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 336 | | NYCPRIVO 3710 | Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 337 | | NYCPRIVO 3761 | Deliberative | Draft report re: | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 338 | | NYCPRIVO 3766 | Deliberative | Draft report re: Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |
| 339 | | NYCPRIVO 3904 | Deliberative | Draft report re: Neighborhood Demographics;Commitment to Fair Housing | DPP | draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ |

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| 340 | | NYCPRIVO 2191 | Deliberative | Draft report re: MIH - Anti-displacement strategies;MIH - Community opposition | DPP | Draft portion of 10-year housing plan; produce final 10-YEAR PLAN; DO NOT PRODUCE UNDER RODRIGUEZ |
| 341 | | NYCPRIVO 2395 | Deliberative | Internal Memorandum re: Litigation - Winfield Litigation | NP | Per City's Agreement |
| 342 | | NYCPRIVO 2396 | Attorney Client | Email chain re: Application of Community Preference | NP | not conveying legal advice or seeking legal advice |
| 343 | | NYCPRIVO 2193 | Deliberative | Draft talking points re: MIH - Anti-displacement strategies;MIH - Community opposition | NP | draft Q&A on Housing NY and MIH |
| 344 | | NYCPRIVO 2200 | Deliberative | Internal Memorandum re: Anti-displacement strategies;Community Opposition Strategies | NP | questions for agencies for purposes of HPD affordable housing planning |
| 345 | | NYCPRIVO 1952 | Legislative | Draft Document re: ENY - Anti-displacement strategies;ENY - City council input;Application of Community Preference | NP | Per City's Agreement |
| 346 | | NYCPRIVO 1971 | Attorney Client;Deliberative | Internal Memorandum re: Application of Community Preference | AC & DPP | draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice |
| 347 | | NYCPRIVO 2261 | Deliberative;Legislative | Draft talking points re: Anti-displacement strategies | NP | document provided by CM Brad Landers about possible bill protecting tenants from harassment |
| 348 | | NYCPRIVO 2283 | Deliberative;Legislative | Draft Internal Memorandum re: Anti-displacement strategies | DPP | decision memo to mayor to guide decision re: Bedford Armory Project; DO NOT PRODUCE UNDER RODRIGUEZ |
| 349 | | NYCPRIVO 2301 | Attorney Client;Legislative | Email chain re: MIH - Community opposition | AC | Withdrawing legislative privilege; communications with counsel and others concerning response to request from CM regarding certain AMI units under MIH policy; reflects legal advice |

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| 350 | | NYCPRIVO 2037 | Deliberative;Legislative | Draft Document re: ENY - Anti-displacement strategies;Application of Community Preference | NP | draft outline of issues to inform decisions re: East New York development |
| 351 | | NYCPRIVO 2302 | Deliberative;Legislative | Email chain re: Anti-displacement strategies; ENY - Anti-displacement strategies | DPP & Legislative | |
| 352 | | NYCPRIVO 2040 | Deliberative | Email chain re: MIH - Anti-displacement strategies | NP | communications re: state of the city address highlights as talking points to press |
| 353 | | NYCPRIVO 2355 | Attorney Client;Deliberative | Draft talking points re: 421-a - Homeless Preference | NP | Per City's Agreement |
| 354 | | NYCPRIVO 2360 | Deliberative | Email chain re: 421-a - Homeless Preference | NP | Per city's Agreement |
| 355 | | NYCPRIVO 2362 | Deliberative | Email chain re: Anti-displacement strategies | DPP | communication re: East Harlem Displacement number error in connection with preparing scope of work for RFP; PRODUCE UNDER RODRIGUEZ |
| 356 | | NYCPRIVO 2063 | Deliberative | Email chain re: Application of Community Preference | NP | communications re: albany housing agenda presentation and mayor's talk with Castro about CPP |
| 357 | | NYCPRIVO 2066 | Attorney Client;Deliberative;Work Product | Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference | AC & DPP | draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice |
| 358 | | NYCPRIVO 2393 | Deliberative;Legislative | Draft talking points re: Anti-displacement strategies | DPP & Legislative | version of proposed bill advocated by Administration to prevent Tenant harassment; PRODUCE UNDER RODRIGUEZ |
| 359 | | NYCPRIVO 2398 | Attorney Client;Deliberative;Work Product | Draft presentation re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | AC & WP | draft of document analyzing settlement options |
| 360 | | NYCPRIVO 3973 | Attorney Client | Email chain re: Community Opposition Strategies | NP | Per City's Agreement |

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| 361 | | NYCPRIVO 2079 | Attorney Client;Deliberative | Draft Internal Memorandum re: Commitment to Fair Housing | AC & DPP | draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice |
| 362 | | NYCPRIVO 2086 | Deliberative | Draft talking points re: Application of Community Preference | NP | Per City's Agreement |
| 363 | | NYCPRIVO 2087 | Attorney Client;Deliberative | Draft Internal Memorandum re: Commitment to Fair Housing | AC & DPP | draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice |
| 364 | | NYCPRIVO 2088 | Attorney Client;Deliberative | Draft Internal Memorandum re: Commitment to Fair Housing | AC & DPP | draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice |
| 365 | | NYCPRIVO 2412 | Deliberative | Draft Document re: Anti-displacement strategies | NP | draft submission to receive an award for innovations in government - public engagement unit submission |
| 366 | | NYCPRIVO 2487 | Work Product | Internal Memorandum re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy |
| 367 | | NYCPRIVO 2488 | Work Product | Internal Memorandum re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy |
| 368 | | NYCPRIVO 2490 | Work Product | Notes re: Litigation - Winfield Litigation | WP | Analysis for informing litigation strategy |
| 369 | | NYCPRIVO 2491 | Deliberative;Work Product | Internal Memorandum re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP | technical notes for housing study for litigation |
| 370 | | NYCPRIVO 2493 | Deliberative;Work Product | Internal Memorandum re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP | technical notes for housing study for litigation |
| 371 | | NYCPRIVO 2496 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation | WP & DPP | internal deliberations regarding analysis for litigation |
| 372 | | NYCPRIVO 2497 | Deliberative;Work Product | Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | NP | Per City's Agreement |
| 373 | | NYCPRIVO 2498 | Deliberative;Work Product | Draft presentation re: Litigation - Winfield Litigation;Housing Connect Data Analysis | NP | Per City's Agreement |

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| 374 | | NYCPRIVO 2501 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | NP | Per City's Agreement |
| 375 | | NYCPRIVO 2502 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 376 | | NYCPRIVO 2504 | Deliberative;Work Product | Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | NP | Per City's Agreement |
| 377 | | NYCPRIVO 2506 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation | WP & DPP | Internal presentation of internal study of various data conducted to inform litigation strategy and settlement position in Winfield |
| 378 | | NYCPRIVO 2507 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | NP | Per City's Agreement |
| 379 | | NYCPRIVO 2508 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 380 | | NYCPRIVO 2510 | Deliberative;Work Product | Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | NP | Per City's Agreement |
| 381 | | NYCPRIVO 2511 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | Internal presentation of internal study of various data conducted to inform litigation strategy and settlement position in Winfield |
| 382 | | NYCPRIVO 2513 | Deliberative;Work Product | Draft presentation re: Litigation - Winfield Litigation;Housing Connect Data Analysis | NP | Per City's Agreement |
| 383 | | NYCPRIVO 2515 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 384 | | NYCPRIVO 2526 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 385 | | NYCPRIVO 2527 | Deliberative;Work Product | Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |

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| 386 | | NYCPRIVO 2536 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 387 | | NYCPRIVO 2537 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 388 | | NYCPRIVO 2538 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 389 | | NYCPRIVO 2540 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 390 | | NYCPRIVO 2542 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 391 | | NYCPRIVO 2543 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 392 | | NYCPRIVO 2546 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 393 | | NYCPRIVO 2558 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 394 | | NYCPRIVO 2559 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 395 | | NYCPRIVO 2560 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 396 | | NYCPRIVO 2575 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 397 | | NYCPRIVO 2576 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 398 | | NYCPRIVO 2577 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |

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| 399 | | NYCPRIVO 2578 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 400 | | NYCPRIVO 2579 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 401 | | NYCPRIVO 2580 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 402 | | NYCPRIVO 2581 | Deliberative;Work Product | Draft Internal Memorandum re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 403 | | NYCPRIVO 2582 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 404 | | NYCPRIVO 2583 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 405 | | NYCPRIVO 2584 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 406 | | NYCPRIVO 2585 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 407 | | NYCPRIVO 2586 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 408 | | NYCPRIVO 2587 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 409 | | NYCPRIVO 3974 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 410 | | NYCPRIVO 2588 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |

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| 411 | | NYCPRIVO 2589 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 412 | | NYCPRIVO 2590 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 413 | | NYCPRIVO 2591 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 414 | | NYCPRIVO 2592 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 415 | | NYCPRIVO 2593 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 416 | | NYCPRIVO 2595 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 417 | | NYCPRIVO 2596 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 418 | | NYCPRIVO 2597 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 419 | | NYCPRIVO 2602 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 420 | | NYCPRIVO 2605 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 421 | | NYCPRIVO 2606 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 422 | | NYCPRIVO 2610 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 423 | | NYCPRIVO 2611 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 424 | | NYCPRIVO 2612 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |

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| 425 | | NYCPRIVO 2613 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 426 | | NYCPRIVO 2614 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 427 | | NYCPRIVO 2615 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 428 | | NYCPRIVO 2617 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 429 | | NYCPRIVO 2619 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 430 | | NYCPRIVO 2620 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 431 | | NYCPRIVO 2621 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 432 | | NYCPRIVO 2622 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 433 | | NYCPRIVO 2655 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 434 | | NYCPRIVO 2656 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 435 | | NYCPRIVO 2657 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 436 | | NYCPRIVO 2658 | Deliberative;Work Product | Draft Document re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 437 | | NYCPRIVO 2659 | Deliberative;Work Product | Draft Document re: Litigation - Winfield Litigation;AFFH and Community Preference;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 438 | | NYCPRIVO 2660 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation | WP & DPP | framework for analysis to inform litigation strategy and settlement |
| 439 | | NYCPRIVO 2668 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |

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| 440 | | NYCPRIVO 2669 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 441 | | NYCPRIVO 2670 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 442 | | NYCPRIVO 2671 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 443 | | NYCPRIVO 2672 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 444 | | NYCPRIVO 2673 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Analysis for informing litigation strategy |
| 445 | | NYCPRIVO 2674 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 446 | | NYCPRIVO 2676 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 447 | | NYCPRIVO 2679 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Analysis for information litigation strategy |
| 448 | | NYCPRIVO 2680 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy |
| 449 | | NYCPRIVO 2681 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 450 | | NYCPRIVO 2682 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 451 | | NYCPRIVO 2686 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 452 | | NYCPRIVO 2687 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 453 | | NYCPRIVO 2692 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy |
| 454 | | NYCPRIVO 2695 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 455 | | NYCPRIVO 2696 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 456 | | NYCPRIVO 2700 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 457 | | NYCPRIVO 2701 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 458 | | NYCPRIVO 2702 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |

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| 459 | | NYCPRIVO 2703 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 460 | | NYCPRIVO 2704 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 461 | | NYCPRIVO 2746 | Deliberative;Work Product | Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 462 | | NYCPRIVO 2747 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;AFFH and Community Preference;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy |
| 463 | | NYCPRIVO 2748 | Deliberative | Internal Charts or Maps re: Litigation - Winfield Litigation;AFFH and Community Preference | WP | draft data analysis to inform litigation strategy and settlement |
| 464 | | NYCPRIVO 2749 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP & DPP | analysis to inform litigation strategy and settlement |
| 465 | | NYCPRIVO 2760 | Deliberative | Final report (non-public) re: Application of Community Preference;Housing Connect Data Analysis | DPP | describes housing and neighborhood study conducted for purposes of evaluating impact of subsidized housing on health and well being and school performance; PRODUCE UNDER RODRIGUEZ |
| 466 | | NYCPRIVO 2753 | Work Product | Notes re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy |
| 467 | | NYCPRIVO 2754 | Work Product | Draft Document re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy; in anticipation of litigation; FOIL request from plaintiff's counsel |
| 468 | | NYCPRIVO 3990 | Work Product | Notes re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | created to respond to FOIL request made by Gurion |
| 469 | | NYCPRIVO 2755 | Work Product | Draft report re: Litigation - Winfield Litigation | WP | Analysis for informing litigation strategy |
| 470 | | NYCPRIVO 2093 | Attorney Client;Deliberative | Draft Internal Memorandum re: Commitment to Fair Housing | AC & DPP | decision memo to mayor re: MIH seeking/reflecting legal advice |

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| 471 | | NYCPRIVO 3991 | Deliberative | Draft letter re: Anti-displacement strategies;421-a - Homeless Preference | NP | Draft letter from Mayor to constituents re: affordable housing |
| 472 | | NYCPRIVO 3992 | Attorney Client;Deliberative | Draft Internal Memorandum re: MIH - Anti-displacement strategies;Application of Community Preference | AC & DPP | draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice |
| 473 | | NYCPRIVO 3998 | Deliberative | Draft report re: MIH - Anti-displacement strategies;Application of Community Preference | DPP | Decision memo to mayor re: how to engage with private applications subject to MIH at Barnett Ave.; DO NOT PRODUCE UNDER RODRIGUEZ |
| 474 | | NYCPRIVO 4004 | Deliberative | Final letter (non-public) re: MIH - Anti-displacement strategies;ENY - Anti-displacement strategies | NP | produce; same as 310 |
| 475 | | NYCPRIVO 4007 | Deliberative | Draft talking points re: Anti-displacement strategies | NP | draft Q&As re: affordable housing in connection with 2015 mayor state of city address |
| 476 | | NYCPRIVO 4016 | Attorney Client | Draft report re: Anti-displacement strategies;ENY - Anti-displacement strategies | AC | communication from attorney summarizing thoughts and next steps on affordable housing in specific neighborhood |
| 477 | | NYCPRIVO 4082 | Attorney Client;Deliberative | Email chain re: Anti-displacement strategies;Commitment to Fair Housing | DPP | communication re: draft RFP for HRA program reflecting comments and revisions; DO NOT PRODUCE UNDER RODRIGUEZ |
| 478 | | NYCPRIVO 4088 | Attorney Client;Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | AC | attorney comments and revisions to anti-harassment tenant protection program RFP |
| 479 | | NYCPRIVO 4089 | Deliberative | Email chain re: Anti-displacement strategies | NP | communications re: draft press release for legal services for tenants |
| 480 | | NYCPRIVO 4090 | Attorney Client;Deliberative | Draft report re: Anti-displacement strategies;Commitment to Fair Housing | AC | attorney comments and revisions to anti-harassment tenant protection program RFP |

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| 481 | | NYCPRIVO 4107 | Deliberative | Draft report re: Commitment to Fair Housing | AC | attorney comments and revisions to anti-harassment tenant protection program RFP |
| 482 | | NYCPRIVO 4114 | Deliberative | Draft talking points re: Anti-displacement strategies;Commitment to Fair HousingNP | NP | testimony of Jordan Dressler before NYC Council committee on 2017 budget |
| 483 | | NYCPRIVO 2432 | Work Product | Draft Internal Memorandum;Notes re: Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP | Research for informing litigation strategy and settlement position |
| 484 | | NYCPRIVO 2433 | Deliberative;Work Product | Draft report;Internal Charts or Maps re: Litigation - Winfield Litigation;Application of Community Preference | WP & DPP | discussing settlement options in this case |
| 485 | | NYCPRIVO 2434 | Attorney Client;Deliberative | Email chain;Notes re: 421-a - Homeless Preference;Application of Community Preference | AC | Communication concerning topic for which legal advice is sought re: application of CPP a certain lottery applicant |
| 486 | | NYCPRIVO 2436 | Work Product | Draft report re: Litigation - Winfield Litigation | WP | Atty questions re: CPP and statistical tests |
| 487 | | NYCPRIVO 2440 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 488 | | NYCPRIVO 2442 | Deliberative;Work Product | Notes re: Litigation - Winfield Litigation | WP & DPP | notes discussing settlement options in this case |
| 489 | | NYCPRIVO 2443 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis | WP | Analysis for informing litigation strategy |
| 490 | | NYCPRIVO 2444 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 491 | | NYCPRIVO 2445 | Deliberative;Work Product | Draft report;Notes re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | notes discussing metrics for analysis in case |

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| 492 | | NYCPRIVO 2446 | Deliberative;Work Product | Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation | WP & DPP | analysis to inform litigation strategy and settlement |
| 493 | | NYCPRIVO 2447 | Deliberative;Work Product | Draft report re: Litigation - Winfield Litigation | WP & DPP | description of studies about gentrification & displacement relevant to case analysis |
| 494 | | NYCPRIVO 2449 | Deliberative;Legislative | Notes re: 421-a - Homeless Preference | DPP | Internal working notes reflecting questions/considerations in determining implementation of certain preferences; DO NOT PRODUCE UNDER RODRIGUEZ |
| 495 | | NYCPRIVO 2453 | Deliberative | Draft talking points;Draft Document re: Anti- displacement strategies | NP | notes on draft talking points about Inwood Neighborhood study |
| 496 | | NYCPRIVO 2454 | Deliberative | Notes;Internal Memorandum re: Community Opposition Strategies | DPP | notes from neighborhood strategies team meeting about preserving housing; reflects internal discussions about policy strategies; DO NOT PRODUCE UNDER RODRIGUEZ |
| 497 | | NYCPRIVO 4118 | Deliberative | Notes re: Anti- displacement strategies | DPP | action steps and strategies related to homeless prevention policy; DO NOT PRODUCE UNDER RODRIGUEZ |
| 498 | | NYCPRIVO 2481 | Work Product | Internal Charts or Maps re: Litigation - Winfield Litigation | WP | Legal analysis and settlement strategies |
| 499 | | NYCPRIVO 2482 | Attorney Client;Deliberative;Work Product | Notes;Draft Document re: Litigation - Winfield Litigation;Commitment to Fair Housing | NP | Per City's Agreement (except p. 5 which are attorney notes) |
| 500 | | NYCPRIVO 2485 | Work Product | Draft Document re: Litigation - Winfield Litigation | WP | Legal analysis and settlement strategies |